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12 Attorneys for Plaintiff,  
13 United States of America

14 IN THE UNITED STATES DISTRICT COURT FOR THE  
15 CENTRAL DISTRICT OF CALIFORNIA  
16 WESTERN DIVISION

17 UNITED STATES OF AMERICA, )

18 Plaintiff, )

19 v. )

Civil No. 2:10-cv-01852

20 ALEXANDER H. ADAMS, individually, )  
21 and doing business as ADAMS )  
BEACH INCOME TAX; BRANDON A. )  
22 ADAMS; and GARRETT R. ADAMS, )

23 Defendants. )

**Request for Entry of Default  
Against Alex H. Adams, d/b/a  
Adams Beach Income Tax;  
Brandon A. Adams; and Garrett  
R. Adams, and Declaration of  
Trial Attorney Grayson A.  
Hoffman**

24 TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
25 CENTRAL DISTRICT OF CALIFORNIA:

26 The United States of America requests that the clerk enter default against Alexander  
27 H. Adams, individually, and doing business as Adams Beach Income Tax, Brandon  
28

1 A. Adams, and Garrett R. Adams (“defendants”), for their failure to plead or  
2 otherwise defend in a timely manner, as provided by Rule 55(a) of the Federal  
3 Rules of Civil Procedure.

4 This request is based on the attached declaration of Trial Attorney Grayson  
5 A. Hoffman, and other documents filed with the Court, which show:

- 6 1. On March 16, 2010, the United States personally served copies of the  
7 summons and complaint on Alex H. Adams, d/b/a Adams Beach Tax  
8 Income, and Brandon A. Adams. Their answers were due on April 6,  
9 2010.<sup>1</sup>
- 10 2. On March 18, 2010, the United States personally served copies of the  
11 summons and complaint on Garret R. Adams. His answer was due on  
12 April 8, 2010.<sup>2</sup>
- 13 3. As of the date of this request, defendants have not answered or  
14 otherwise responded to the complaint, and the time to answer or  
15 respond has not been extended.<sup>3</sup>
- 16 4. Upon information and belief, defendants are neither incompetent, nor  
17 infants. Defendants are not on active duty in the United States  
18 Military.<sup>4</sup>

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24 <sup>1</sup> Docket ## 4-5.

25 <sup>2</sup> Docket # 6.

26 <sup>3</sup> Hoffman Declaration at ¶ 2.

27 <sup>4</sup> *Id.* at ¶ 4.

1  
2 Date: April 16, 2010

3 Respectfully submitted,

4  
5 ANDRE' BIROTTE, JR.  
6 United States Attorney

7 /s/ Grayson A. Hoffman  
8 GRAYSON A. HOFFMAN  
9 Member, Virginia Bar, 73726  
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**CERTIFICATE OF SERVICE**

I hereby certify that service of the REQUEST FOR ENTRY OF DEFAULT AGAINST ALEX H. ADAMS, d/b/a ADAMS BEACH TAX INCOME, BRANDON A. ADAMS, AND GARRET R. ADAMS, AND DECLARATION OF TRIAL ATTORNEY GRAYSON A. HOFFMAN, and PROPOSED ENTRY OF DEFAULT BY CLERK has been made on this 16<sup>th</sup> day of April, 2010, by mailing copies of the documents through the U.S. Mail to Alex H. Adams, d/b/a Adams Beach Tax Income, Brandon A. Adams, and Garret R. Adams, and by filing the documents through the Court's ECF system.

/s/ Grayson A. Hoffman

Grayson A. Hoffman  
Trial Attorney

**DECLARATION OF TRIAL ATTORNEY GRAYSON A. HOFFMAN**

1. I am the attorney for the United States in the above-captioned action.
2. Defendants Alex H. Adams, d/b/a Adams Beach Tax Income, Brandon A. Adams, and Garret R. Adams have not answered or otherwise responded to the complaint.
3. Upon information and belief, defendant Alex H. Adams, Brandon A. Adams, and Garret R. Adams are neither incompetent nor infants.
4. I consulted the Department of Defense Manpower Data Center Service members' Civil Relief act database at:  
*http://www.dmdc.osd.mil/scra/owa/home*, and entered in its search parameters the Social Security numbers of Alex H. Adams, Brandon A. Adams, and Garret R. Adams. The database did not possess any information indicating that any of the defendants are on active duty with the United States military.

**CERTIFICATION**

I declare under penalty of perjury that the forgoing is true and correct.

Executed on April 16, 2010.

/s/ Grayson A. Hoffman  
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U.S. Department of Justice  
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